



*Consulting Engineers
and Scientists*

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(PBW Project No. 5040)

VIA ELECTRONIC MAIL

Ms. Raji Josiam
Remedial Project Manager, 6SF-RA
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue
Dallas, Texas 75202

Re: Bi-Monthly Progress Report, US Oil Recovery (USOR) Superfund Site,
Area of Investigation 1 (AOI-1), Pasadena, Texas

Dear Ms. Josiam:

Pursuant to Section IX, Paragraph 44 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study (Settlement Agreement) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this bi-monthly progress report on behalf of the Respondents named in the Settlement Agreement. In accordance with the Settlement Agreement requirements, this progress report addresses the topics listed below:

1. Actions which have been taken to comply with the Settlement Agreement during the preceding two-month period – The following actions were taken during the previous two-month period:
 - The Respondents submitted the revised Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP), and Health and Safety Plan (HASP) to the U.S. Environmental Protection Agency (EPA) on December 23, 2015. Following subsequent discussions between the Respondents and EPA, an addendum schedule to the RI/FS Work Plan (replacement to Figure 10 in the Work Plan) was submitted by the Respondents on February 23, 2016. EPA issued an approval letter for the RI/FS Work Plan (including the schedule addendum), the FSP, and the QAPP on February 23, 2016.
 - Pursuant to Section XII, Paragraph 59 of the Settlement Agreement, Respondents have continued their best efforts to obtain agreements with adjacent property owners in order to gain necessary access to the properties for collecting the soil and groundwater samples proposed for RI/FS Iteration 1 for AOI-1, as described in the RI/FS Work Plan.
 - The Respondents began the activities necessary to initiate RI/FS field work in accordance with the approved schedule addendum.
2. Summary of quality-assured results of sampling, tests and all other quality-assured data received by Respondents during the preceding two-month period – No results or data were generated during the preceding two-month period.

3. Work planned for next two months with schedules relating such Work to the overall project schedule for RI/FS completion – The following work is planned for the next two months:
 - RI/FS field activities are scheduled to be initiated on May 2, 2016. (This letter is intended to fulfill the Settlement Agreement Section XI, Paragraph 55 requirement for advance notice of those field activities to EPA).
 - The Respondents will continue their best efforts to pursue access agreements for the properties requiring access for RI/FS Iteration 1 sampling.
 - The Respondents will forward financial assurance information to EPA per Settlement Agreement Section XXVII, Paragraph 106 at least 15 days prior to commencing any on-site field work.
 - Pursuant to Settlement Agreement Section VIII, Paragraph 34, Respondents will notify EPA of the lead/supervisory personnel for the drilling and laboratory subcontractors to be retained in conjunction with the initiation of the aforementioned field activities within 30 days after their retention.
4. Problems encountered, anticipated problems, actual or anticipated delays, and solutions developed and implemented to address any actual or anticipated problems or delays – No problems or delays were encountered during the preceding two-month period. No problems are anticipated.

As recognized in the Settlement Agreement, the associated Statement of Work, and the RI/FS Work Plan, removal actions at the Site present potential interferences with RI/FS field activities. Although the Respondents will make their best efforts to minimize the effects of the ongoing removal actions on the RI/FS schedule, it is possible that unavoidable delays may result from the concurrent performance of removal action and RI/FS activities.

Thank you for the opportunity to submit this progress report. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Eric Pastor, P.E.
USOR PRP Group Project Coordinator

cc: Mr. Patrick Gobb - NewFields
Mr. Matthew Wickham – PBW